

DOCKET NO. 2019-184-E

**SOUTH CAROLINA ENERGY FREEDOM ACT (H.3659) PROCEEDING TO
ESTABLISH DOMINION ENERGY SOUTH CAROLINA, INC.'S STANDARD OFFER,
AVOIDED COST METHODOLOGIES, FORM CONTRACT POWER PURCHASE
AGREEMENTS, COMMITMENT TO SELL FORMS, AND ANY OTHER TERMS AND
CONDITIONS NECESSARY (INCLUDES SMALL POWER PRODUCERS AS
DEFINED IN 16 UNITED STATES CODE 796, AS AMENDED) – S.C. CODE ANN.
SECTION 58-41-20(A)**

**LATE-FILED HEARING EXHIBIT OF SOUTH CAROLINA SOLAR BUSINESS
ALLIANCE**

HEARING EXHIBIT NO. ____

SEE ATTACHED

Matthew W. Gissendanner
Assistant General Counsel
Dominion Energy Southeast Services, Inc.

220 Operation Way, MC C222, Cayce, SC 29033
DominionEnergy.com



September 19, 2019

VIA HAND DELIVERY

Weston Adams, III, Esquire
Jeremy C. Hodges, Esquire
Nelson Mullins
1320 Main Street, 17th Floor
Columbia, SC 29201

RE: South Carolina Energy Freedom Act (H.3659) Proceeding to
Establish Dominion Energy South Carolina, Inc.'s Standard
Offer, Avoided Cost Methodologies, Form Contract Power
Purchase Agreements, Commitment to Sell Forms, and Any
Other Terms or Conditions Necessary (Includes Small Power
Producers as Defined in 16 United States Code 796, as Amended)
– S.C. Code Ann. Section 58-41-20(A)
Docket No. 2019-184-E

Dear Counsel:

Enclosed on behalf of Dominion Energy South Carolina, Inc. ("DESC" or "the Company") are responses to the Second Interrogatories and Requests for Production of the South Carolina Solar Business Alliance, Inc. Please be advised that DESC's responses contain information which is confidential and is being provided pursuant to a Confidentiality Agreement executed between SCSBA and DESC on August 19, 2019.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in blue ink that reads "Matthew W. Gissendanner".

Matthew W. Gissendanner

MWG/kms
Enclosures

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2019-184-E

South Carolina Energy Freedom Act)	
(H. 3659) Proceeding to Establish Dominion)	
Energy South Carolina, Incorporated's)	Dominion Energy South
Standard Offer, Avoided Cost Methodologies,)	Carolina, Inc.'s Responses to
Form Contract Power Purchase Agreements,)	the Second Interrogatories
Commitment to Sell Forms, and Any Other)	and Requests for Production
Terms or Conditions Necessary (Includes)	of the South Carolina
Small Power Producers as Defined in)	Solar Business Alliance, Inc.
16 United States Code 796, as Amended) -)	
<u>S.C. Code Ann. Section 58-41-20(A)</u>)	

Pursuant to 10 S.C. Code Ann. Regs 103-833 (2012) and Rules 33 and 34, South Carolina Rules of Civil Procedure, Dominion Energy South Carolina, Inc. ("DESC" or the "Company") provides the following responses to the Second Interrogatories and Requests for Production of the South Carolina Solar Business Alliance, Inc. DESC reserves the right to update and supplement these responses.

GENERAL OBJECTIONS

In setting forth its responses, DESC does not concede the relevance or materiality of documents listed in this response, and reserves the right to question the relevancy, materiality, privilege, and admissibility of any documents referred to herein.

In setting forth its responses, the Company does do not waive any attorney/client, work product, or other privilege or immunity which may attach to

information called for in, or which may be responsive to, the Second Interrogatories and Requests for Production.

DESC objects to all of the interrogatories and requests for production that ask the Company to create or generate any information unknown to DESC in the course of assembling, creating, or generating those documents maintained in the regular course of business.

DESC reserves the right to revise, correct, supplement or clarify any of its responses or documents referred to herein but does not accept any requirement to do so beyond what is required by law.

The above objections, privileges, and immunities are asserted in response to each of the following interrogatories and requests as if set forth verbatim at the beginning to each interrogatory and request.

Subject to and without waiving these objections, the Company responds to the Second Interrogatories and Requests for Production via the information on the enclosed compact disc.

[SIGNATURE PAGE TO FOLLOW]

Respectfully submitted,



K. Chad Burgess, Esquire
Matthew W. Gissendanner, Esquire
Dominion Energy South Carolina, Inc.
Mail Code C222
220 Operation Way
Cayce, South Carolina 29033
(803) 217-8141
chad.burgess@scana.com
matthew.gissendanner@scana.com

Attorneys for Dominion Energy South
Carolina, Inc.

September 19, 2019

Cayce, South Carolina

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2019-184-E

IN RE:

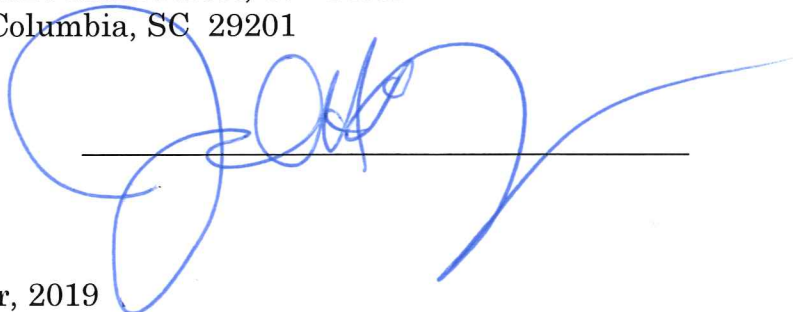
South Carolina Energy Freedom Act (H.3659))	
Proceeding to Establish Dominion Energy South)	CERTIFICATE OF
Carolina, Inc.'s Standard Offer, Avoided Cost)	SERVICE
Methodologies, Form Contract Power Purchase)	
Agreements, Commitment to Sell Forms, and Any)	
Other Terms or Conditions Necessary (Includes)	
Small Power Producers as Defined in 16 United)	
States Code 796, as Amended) – S.C. Code Ann.)	
Section 58-41-20(A))	

This is to certify that I have caused to be served this day one (1) copy of
Dominion Energy South Carolina, Inc.'s **Responses to the Second**
Interrogatories and Requests for Production of the South Carolina
Solar Business Alliance, Inc. to the persons named below at the address
set forth via hand delivery:

Weston Adams, III
Jeremy C. Hodges
Nelson Mullins
1320 Main Street, 17th Floor
Columbia, SC 29201

Cayce, South Carolina

This 19th day of September, 2019



**DOMINION ENERGY SOUTH CAROLINA, INC.
SOUTH CAROLINA SOLAR BUSINESS ALLIANCE, INC.
SECOND INTERROGATORIES AND REQUEST FOR PRODUCTION
DOCKET NO. 2019-184-E**

INTERROGATORY 16:

Please refer to Direct Testimony of James W. Neely, p. 11 which states, "The change case for non-solar QFs is derived from the base case by subtracting a 100 MW round-the-clock power purchase profile. The avoided costs are then accumulated into four time-of-use periods." Please provide the avoided costs for each hour of each year, prior to being accumulated into the four time-of-use periods. Please provide this in MS Excel format.

ANSWER 16:

DESC does not have any information responsive to this request. The accumulation of hourly avoided cost into the various time periods is internal to the model. The only avoided costs available are the all hours avoided costs and the time period avoided costs.

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

Docket No. 2019-184-E

South Carolina Energy Freedom)
 Act (H.3659) Proceeding to)
 Establish Dominion Energy)
 South Carolina, Incorporated's)
 Standard Offer, Avoided Cost)
 Methodologies, Form Contract)
 Power Purchase Agreements,)
 Commitment to Sell Forms,)
 and Any Other Terms or)
 Conditions Necessary)
 (Includes Small Power Producers)
 as Defined in 16 United States)
 Code 796, as Amended))

CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day one copy of the **LATE FILED HEARING EXHIBIT** to the persons named below at the addresses set forth via electronic mail:

Becky Dover, Counsel SC Department of Consumer Affairs Email: bdover@scconsumer.gov	Belton T. Zeigler Womble Bond Dickinson (US) LLP Email: belton.zeigler@wbd-us.com
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Lauren Joy Bowen Southern Environmental Law Center lbowen@selcnc.org	Maia Danaid Hutt Southern Environmental Law Center mhutt@selcnc.org

/s/ Jeremy C. Hodges

Jeremy C. Hodges

Columbia, SC
October 17, 2019